

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY
DELIVERY NEW ENGLAND**

D.T.E. 03-40

ATTORNEY GENERAL'S FIFTEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-15-1 Referring to Exhibit KEDNE/RBE-1, page 1, please indicate whether Mr. Edelstein holds any positions with GTI or its affiliates other than that of GTI Director, State Regulatory Programs.
- AG-15-2 Referring to Exhibit KEDNE/RBE-1, page 1, please provide a complete and detailed description of Mr. Edelstein's duties and responsibilities as Director, State Regulatory Programs.
- AG-15-3 Referring to Exhibit KEDNE/RBE-1, page 1, please indicate whether Mr. Edelstein receives any variable, incentive, or bonus compensation in his position as Director, State Regulatory Programs.
- AG-15-4 Referring to Exhibit KEDNE/RBE-1, page 3, lines 1-8, please provide a complete and detailed description of the major types of research and development performed by each of the organizations listed there.
- AG-15-5 Referring to Exhibit KEDNE/RBE-1, page 4, lines 6-13, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-6 Referring to Exhibit KEDNE/RBE-1, page 4, lines 14-19, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.

- AG-15-7 Referring to Exhibit KEDNE/RBE-1, page 4, lines 20-26, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-8 Referring to Exhibit KEDNE/RBE-1, page 5, lines 1-9, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-9 Referring to Exhibit KEDNE/RBE-1, page 5, lines 10-13, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-10 Referring to Exhibit KEDNE/RBE-1, page 5, lines 14-21, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-11 Referring to Exhibit KEDNE/RBE-1, page 5, lines 22-26, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-12 Referring to Exhibit KEDNE/RBE-1, page 6, lines 3-9, please indicate those organizations referred to on Exhibit KEDNE/RBE-1, page 3, lines 1-8, that perform the same or similar research and / or development.
- AG-15-13 Referring to Exhibit KEDNE/RBE-1, page 6, lines 13-15, please provide all analyses, research, studies, and academic support for Mr. Edelstein's statement that "manufacturers generally have no incentive – cost or otherwise – to produce such efficient or environmentally friendly equipment."
- AG-15-14 Referring to Exhibit KEDNE/RBE-1, page 6, lines 14-15, please provide copies of the FERC decision or decisions referred to in that statement.
- AG-15-15 Referring to Exhibit KEDNE/RBE-1, page 10, lines 2-4, please provide copies of all workpapers, calculations, formulas, assumptions, and other supporting documentation for Mr. Edelstein's statement that "consumers have realized billions of dollars of benefits from gas consumer interest R&D."
- AG-15-16 Referring to Exhibit KEDNE/RBE-1, page 10, lines 4-7, please provide copies of all workpapers, calculations, formulas, assumptions, and other supporting documentation for Mr. Edelstein's claim of an "overall consumer benefits-to-cost ration of 9/1," from

R&D.”

- AG-15-17 Please provide GTI’s 2001 and 2002 Annual filings for its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code.
- AG-15-18 Please provide copies of GTI’s 2002 and 2001 Balance Sheets, Income Statements, and Statements of Cash Flows.
- AG-15-19 Please provide a list of the current Research and Development projects currently being undertaken by GTI. For each project please provide the following information:
- (1) a complete and detailed description of the nature and purpose of the project along with the expected outcome;
 - (2) the total originally estimated cost of the project;
 - (3) the total cost of the project to date;
 - (4) the current estimated cost of the project; and
 - (5) the current annual cost of the project.
- AG-15-20 Please provide KeySpan’s total contribution to GTI along with the amounts assigned / allocated to each of its subsidiaries.
- AG-15-21 Please itemize and quantify GTI’s Royalties and Patent Rights Revenues.
- AG-15-22 Please provide a complete and detailed description of the fee paying members rights and privileges to GTI’s Royalties and Patent Rights.
- AG-15-23 Please provide the workpapers, calculations, formulas, assumptions and other supporting documentation used to determine the fees to be paid by KeySpan and that proportion to be paid by Boston Gas Company.

Dated: May 21, 2003